From:	andycowitt@andycowitt.com
To:	Contact OGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Thursday, June 16, 2022 9:19:39 PM

Hello.
I have read about proposed rule RIN 3209-AA50 and object to the notion that compliance with this regulation should be "optional." Please make compliance mandatory.

I also suggest the following changes to make the regulation less offensive and a more credible and useful tool in combatting corruption:

- replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;
- remove the offensive example involving an accused sexual harasser; and
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you,
Andy Cowitt
Oakland, CA